

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20461 Navier

November 21, 2002

RQ-3

Mike Fraioli, Treasurer Southern California Fund 555 South Flower Street, #4510 Los Angeles, CA 90071

Identification Number.

C00361410

Reference:

12 Day Pre-Special (1/1/01-5/30/01), 30 Day Post-Special (5/31/01-

7/9/01) and Year End (7/10/01-12/31/01) Reports

Dear Mr. Fraioli:

This letter is to inform you that as of November 20, 2002, the Commission has not received your response to our requests for additional information dated October 30, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

Due to recent events, the United States Postal Service is experiencing delays in the processing and delivery of mail for the Washington D.C. area. Consequently, the Federal Election Commission is not in receipt of all incoming mail. The Commission recommends that you resubmit your response to this notice and consider using alternate delivery services such as overnight delivery or delivery by courier. If feasible, your response can also be hand-delivered. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.FEC.gov.

An adequate response must be received at the Commission by December 11, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather

than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Brandy Phillips on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

Enclosures



RQ-2

Mike Fraioli, Treasurer Southern California Fund 555 South Flower Street, #4510 Los Angeles, CA 90071

GCT 2 9 2002

Identification Number:

C00361410

Reference:

Year End Report (7/10/01-12/31/01)

Dear Mr. Fraioli:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed <u>during</u> each two year election cycle beginning with the first report filed in the

non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filets must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Grandy Hulligh

Brandy Phillips

Campaign Finance Analyst Reports Analysis Division

296